These amendments are made without prejudice and are not to be construed as abandonment of the previously claimed subject matter or agreement with the Examiner's position.

REMARKS

Status of the Claims.

5   Claims 1-10 and 12-20 remain pending with entry of this amendment, and stand rejected. Claim 11 is cancelled.

United States Patent N° 5,806,005 (Hull)

In Hull, images are stored locally in a camera, until a user decides to transmit them to a remote storage by executing a command that activates a cellular phone transfer (Col. 3: lines 17-33).

10   There is no substantial discussion in Hull of multiple cameras being accessed through a server or of multiple users viewing images using a server (See Fig. 1, and entire patent.). Hull discusses various applications, such as, a photographer taking stereo pictures and receiving processing data from a server (Col. 3: line 34-55), face recognition processing (Col. 3: line 55-60), or making photocopies at various locations (Col. 3: line 61 et seq.) In each of these embodiments, Hull discusses a server

15   station 14 that is used for storage and possible for image processing with communication back to the camera operator (See col. 3: line 48-53).

United States Patent N° 6,144,772 (Garland)

Garland discusses encoding methods for digitized images, particularly encoding different regions at different levels of image quality (Col. 1: line 6-7). A comparison is made to JPEG, which

20   it is asserted does not provide for encoding different regions at different quality levels. The "differential" frames discussed in the patent do not refer to difference between two frames taken at different times but instead refer to differences between a lossy compressed frame and an original frame. These differentials are used to encode some regions with higher quality (Col. 6: lines 28-59; and col. 8, lines 6-52).

25   ### United States Patent N° 6,182,127 (Cronin, III)

Cronin, III discusses a network server system allowing display of large documents at client systems using standard browser software and using a grid of view tiles (Col. 1: line 55-col. 2: line 6).

United States Patent N° 6,182,127 (Chiu)

Chiu discusses a method for transferring data between computer systems where the destination computer system is checked before transfer to ensure that the data does not already exist on the destination computer system (Col. 1: line 58-col. 2: line 16).

5   **RESPONSES TO REJECTIONS**

35 U.S.C. §102(e)

Claims 1-3, 12-14, 16-17, 19 and 20 were rejected under 102(e) as anticipated by Hull. Applicant respectfully traverses.

Claim 1 and dependents
10   Hull does not teach or render obvious at least the elements of claim 1 listed below.

Hull does not teach or render obvious "generating, from said plurality of still frames, a sequence of digital image arrays comprising a full frame and a plurality of differential frames". The Examiner cites Col. 2: lines 1-8. However, the cited passage makes absolute NO REFERENCE to generating...a sequence of digital image arrays comprising a full frame and a plurality of differential
15   frames. After review, Applicant believes that the claimed elements are entirely absent from the cited passage and the rest of the reference. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed "full frame and a plurality of differential frames"

Hull does not teach or render obvious "determining, using said sequence, whether an
20   incident is associated with one or more frames in said sequence." The Examiner cites Col. 2: lines 11-16. However, again, the cited passage makes absolute NO REFERENCE to determining...whether an incident is associated with one or more frames Again, if the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed "determining...whether an incident" is associated
25   with a frame.

Hull does not teach or render obvious "providing said sequence to one or more clients for viewing by a user". The Examiner cites Col. 4: lines 36-46. The cited passage mentions printing an image at a printing device connected to a server (See Fig. 1, 70) OR displaying an image at a display at the camera (See Fig. 1, 30). Thus, any viewing by a user discussed in Hull is viewing
30   directly at the camera and is not viewing of a sequence that is stored at a server.

Dependent claims 2-3 and 12-14 are patentable over Hull for at least the reasons discussed above with respect to claim 1.

Claim 16

Hull does not teach or render obvious at least the elements of claim 16 listed below.

Hull does not teach or render obvious "designating a frame in said plurality as a full frame; for a frame subsequent to said full frame, computing a differential frame wherein a pixel in said differential frame that is within a threshold of a geometrically corresponding pixel in a preceding frame is set to transparent." The Examiner cites no passages from the patent corresponding to these elements. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed elements.

Likewise, Hull does not teach or render obvious "for a for a frame subsequent to said full frame, computing a percentage difference indicating a degree of change of pixels from a preceding frame." The Examiner cites no passages from the patent corresponding to these elements. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed elements.

Likewise, Hull does not teach or render obvious "transmitting a full frame, one or more differential frames, and one or more computed percentages to a camera coordinator" or "determining that an incident has occurred using rules-based logic to analyze data received from said frame grabber" The Examiner cites no passages from the patent corresponding to these elements. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed elements.

Claim 17 and dependents

Hull does not teach or render obvious at least the elements of claim 17 listed below.

Hull does not teach or render obvious "producing a plurality of sequences, said sequences comprising a full frame followed by one or more differential frames wherein pixels in said differential frames are set to transparent when they have a value within a threshold of a value of corresponding pixels in a preceding frame;" and/or "determining whether an incident is associated with one or more frames"; and/or "presenting one or more sequences to a client viewer in response to a viewer's request or when an incident is associated with a sequence." Again, the Examiner cites no passages from the patent corresponding to these elements. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate which specific elements of the cited reference correspond to the claimed elements.

Dependent claims 19 and 20 are patentable over Hull for at least the reasons discussed above with respect to claim 17.

35 U.S.C. §103

Applicant has demonstrated that Hull does not teach or render obvious ANY of the claims rejected under §102(e) because Hull does not even mention one or more elements in each of the claims. Applicant thus traverses each of the Examiner's further rejections under 35 U.S.C.

5   §103(a), because Hull does not include the elements asserted by the Examiner. Applicant offers these further responses to the Examiner's rejections.

Claims 4-6, 9-11 and 18 were rejected under 35 U.S.C. §103(a) as allegedly obvious in light of Hull, further in view of Garland. Applicant respectfully traverses. (Applicant notes that the Examiner cites "Fukuda," apparently in error. No reference to Fukuda is found anywhere else in the

10   Office Action or accompanying papers.) Garland is cited as disclosing "compression encoding" of digital images, differential frames, transparent bits, threshold values, etc. However, Garland is not directed to moving images at all, but to still images with different compression qualities in different areas. The differential frame of Garland is computed between an original image and an encoded then decoded image, with a differential frame applying only to those areas of different image quality.

15   Furthermore, contrary to the Examiner's assertion, Garland does not in any way mention or suggest setting pixels in a differential frame to a transparent pixels. If the Examiner wishes to maintain this rejection, Applicant respectfully requests that the Examiner at least indicate specifically where in the reference this element is taught or suggested.

The Examiner cites Cronin, III as anticipating PNG and GIF formats. However, as the

20   elements of independent claim 1 are not anticipated by Hull, Applicant must respectfully traverse the rejections of claims 7 and 8.
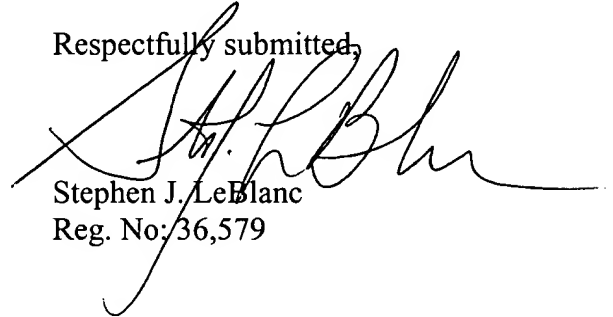
The Examiner cites Chiu as anticipating a network server for displaying data to clients with regard to claim 15. However, again, as the elements of independent claim 1 are not anticipated by Hull, Applicant must respectfully traverse the rejections of claim 15 based on the combination of

25   Hull and Chiu.

Applicant has hereby presented sufficient grounds for overcoming each of the Examiner's rejection. The failure to cite any additional grounds is not to be taken as an admission of any position taken by the Examiner. In view of the foregoing, Applicants believes all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of

5 Allowance at an early date is respectfully requested.

If a telephone conference would expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (510) 337-7855.

LAW OFFICES OF JONATHAN ALAN QUINE
P.O. BOX 458
Alameda, CA 94501
Tel: 510 337-7871
Fax: 510 337-7877
PTO Customer No.: **22798**
Deposit Account No.: **50-0893**

Respectfully submitted,

Stephen J. LeBlanc
Reg. No: 36,579